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June 2, 2025

VIA ECF

Hon. Leda Dunn Wettre
United States Magistrate Judge
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Renavitz v. Boar's Head Provisions Co. Inc.*, Case No. 2:24-cv-10155-JKS-LDW

Dear Judge Wettre:

This firm, together with the law firm of Weinberg Wheeler Hudgins Gunn & Dial, are counsel for defendant Boar's Head Provisions Co., Inc. in the above-referenced action. We submit this letter jointly with counsel for plaintiff Linda Renavitz, individually and as Administrator and Personal Representative of the Estate of Robert Renavitz ("Plaintiff"), to provide a status update in accordance with the Court's Pretrial Scheduling Order, dated February 24, 2025.

With respect to pleadings, Plaintiff filed her Amended Complaint on January 28, 2025. Boar's Head has a pending partial motion to dismiss the claim for breach of express warranty (Count II). As such, Boar's Head has not yet filed an Answer.

The last conference with the Court was held on February 24, 2025. The parties exchanged Rule 26 Disclosures prior to that conference. Since that conference, the parties have engaged in the following discovery:

The parties each served document requests and interrogatories and have exchanged their written responses/objections thereto. The parties have also commenced document productions. Boar's Head produced its initial document production (345,255 documents), consisting of, among other things, documents that were maintained in hard copy at the Jarratt, Virginia plant (the plant that manufactured the liverwurst product at issue in this case). Plaintiff has made substantial progress on reviewing all the documents produced, which consist of over a million pages. Plaintiff has also produced documents, including all of the plaintiff's medical records from treating doctors, in addition to delivering expert reports, with respect to the fields of Conscious Pain and Suffering and Economic Loss. Plaintiff intends to produce additional expert reports as the discovery continues.

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Counsel for the parties have also been meeting and conferring about ESI search parameters. In furtherance of the meet and confer efforts, on April 21, 2025, Plaintiff's counsel provided Boar's Head's counsel with proposed ESI search parameters. Boar's Head's counsel has been evaluating those proposed parameters with its ESI vendor and recently responded with a counterproposal on May 29, 2025. The plaintiff is currently digesting Boar's Head's proposed search terms for ESI data. The plaintiff will either accept those search terms or make a counterproposal soon, so that discovery continues to move efficiently.

In terms of next steps, Boar's Head anticipates making a supplemental production of additional non-ESI documents. Additionally, as soon as the parties are able to reach an agreement on ESI parameters, Boar's Head will continue its ESI searches and review and will commence a rolling production of ESI, which Boar's Head anticipates will be a significant undertaking involving substantial volumes of documents. The parties will also continue to review discovery productions and responses that have been provided to date and evaluate any additional discovery needs.

Should the Court have any questions, the parties can address them at the conference that is scheduled for June 9, 2025, or earlier at the Court's convenience.

Respectfully submitted,

/s/ Jacqueline G. Veit

Jacqueline G. Veit

cc: All counsel of record via ECF